



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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Lewis Bart Stone, Esq., Treasurer  
New York Republican Federal  
Campaign Committee  
c/o Rogers & Wells, 200 Park Ave.  
New York, NY 10166

SEP 13 1994

Identification Number: C00055582

Reference: July Quarterly Report (4/1/94-6/30/94)

Dear Stone:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule H3 discloses receipt of \$32,573.03 from your non-federal account for an exempt expenditures event(s) which is listed as 100% non-federal on Schedule H4. A committee is permitted to pay the entire amount of an allocable activity from its federal account and receive a transfer(s) from its non-federal account solely to cover the non-federal share of the allocable expense(s). 11 CFR §106.5(g)(1). However, a 100% non-federal exempt expenditure event does not fall within the definitions of an allocable expense, and constitutes an impermissible transfer of funds received by your federal account from your non-federal account.

The Commission recommends you immediately transfer the total amount received by your federal account back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this

letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Donald L. Averett  
Senior Reports Analyst  
Reports Analysis Division

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